

February 17, 2012

Kelly Cochran
Deputy Assistant Director for Regulations
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20006-4702

Subject: SBAR Panel on the Truth in Lending Act (TILA) and Real Estate Settlement Procedures Act (RESPA)

Dear Ms. Cochran:

The Office of Advocacy (Advocacy) has received your notification of February 7, 2012 regarding the Small Business Advocacy Review Panel (Panel) for the proposed rulemaking by the CFPB to integrate certain mortgage loan disclosure requirements in the Truth in Lending Act (TILA) and Real Estate Settlement Procedures Act (RESPA)

Advocacy concurs with the preliminary list of Small Entity Representatives (SERs) that the CFPB has identified for the Panel process. We may have two additional names to suggest in the near future. In addition, some of the SERs are members of trade associations such as, but not limited to, the Independent Community Bankers of America, the National Association of Mortgage Brokers, the National Association of Independent Housing Professionals, the American Land Title Association, and the American Bankers Association. Advocacy has found that also allowing additional representatives of the trade associations to attend the SERs meetings as observers and provide technical assistance to their members has proven beneficial to the overall process.

We understand that CFPB would like to convene the TILA/RESPA Panel on February 21, 2012. We look forward to working with you through this process.

Sincerely,

/s/

Winslow Sargeant, Ph.D.
Chief Counsel for Advocacy